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5 Attorneys for Appellant  
Cyprus Bagdad Copper Corporation  
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8 STATE LAND DEPARTMENT OF THE STATE OF ARIZONA  
BEFORE THE BOARD OF APPEALS  
9

10 IN THE MATTER OF APPEAL OF  
APPRaisal OF APPLICATION TO  
PURCHASE GROUNDWATER NO. 21-102152  
11 IN THE AMOUNT OF \$85 PER ACRE-FOOT,  
WITH A MINIMUM ANNUAL REMOVAL OF  
12 80 ACRE-FEET FOR A TOTAL MINIMUM  
ANNUAL ROYALTY OF \$6,800 FOR A TERM  
13 OF TEN YEARS ON STATE LAND  
DESCRIBED AS:

A.B. NO. 997

14 SECTION 17, TOWNSHIP 13 NORTH,  
15 RANGE 9 WEST, YAVAPAI COUNTY,  
ARIZONA  
16

17 IN THE MATTER OF APPEAL OF  
APPRaisal OF APPLICATION TO  
PURCHASE GROUNDWATER NO. 21-102153  
18 IN THE AMOUNT OF \$85 PER ACRE-FOOT,  
WITH A MINIMUM ANNUAL REMOVAL OF  
19 80 ACRE-FEET FOR A TOTAL MINIMUM  
ANNUAL ROYALTY OF \$6,800 FOR A TERM  
20 OF TEN YEARS ON STATE LAND  
DESCRIBED AS:

A.B. NO. 998

21  
22 SECTION 29, TOWNSHIP 14.5 NORTH,  
RANGE 8 WEST, YAVAPAI COUNTY,  
23 ARIZONA  
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1 IN THE MATTER OF APPEAL OF  
2 APPRAISAL OF APPLICATION TO  
3 PURCHASE GROUNDWATER NO. 21-102154  
4 IN THE AMOUNT OF \$85 PER ACRE-FOOT,  
5 WITH A MINIMUM ANNUAL REMOVAL OF  
6 80 ACRE-FEET FOR A TOTAL MINIMUM  
7 ANNUAL ROYALTY OF \$6,800 FOR A TERM  
8 OF TEN YEARS ON STATE LAND  
9 DESCRIBED AS:

A.B. NO. 999

10 SECTION 1, TOWNSHIP 15 NORTH,  
11 RANGE 9 WEST, YAVAPAI COUNTY,  
12 ARIZONA

13 IN THE MATTER OF APPEAL OF  
14 APPRAISAL OF APPLICATION TO  
15 PURCHASE GROUNDWATER NO. 21-102155  
16 IN THE AMOUNT OF \$85 PER ACRE-FOOT,  
17 WITH A MINIMUM ANNUAL REMOVAL OF  
18 80 ACRE-FEET FOR A TOTAL MINIMUM  
19 ANNUAL ROYALTY OF \$6,800 FOR A TERM  
20 OF TEN YEARS ON STATE LAND  
21 DESCRIBED AS:

A.B. NO. 1000

22 SECTION 11, TOWNSHIP 15 NORTH,  
23 RANGE 9 WEST, YAVAPAI COUNTY,  
24 ARIZONA

25 IN THE MATTER OF APPEAL OF  
26 APPRAISAL OF APPLICATION TO  
PURCHASE GROUNDWATER NO. 21-102156  
IN THE AMOUNT OF \$85 PER ACRE-FOOT,  
WITH A MINIMUM ANNUAL REMOVAL OF  
80 ACRE-FEET FOR A TOTAL MINIMUM  
ANNUAL ROYALTY OF \$6,800 FOR A TERM  
OF TEN YEARS ON STATE LAND  
DESCRIBED AS:

A.B. NO. 1001

SECTION 24, TOWNSHIP 15 NORTH,  
RANGE 9 WEST, YAVAPAI COUNTY,  
ARIZONA

APPELLANT: CYPRUS BAGDAD COPPER  
CORP.

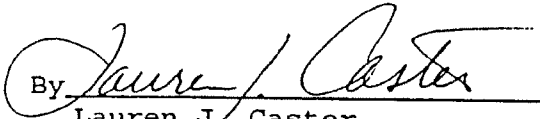
CYPRUS BAGDAD COPPER  
CORPORATION'S RESPONSE  
TO MOTION TO  
CONSOLIDATE

25 Cyprus Bagdad Copper Corporation ("Cyprus Bagdad")  
26 hereby responds to the State Land Department's Motion to

1 Consolidate. Cyprus Bagdad agrees that all of these appeals  
2 should be heard in a single hearing for the convenience of the  
3 Board and the parties. It does not agree that the Board, by  
4 virtue of consolidation, should be obliged to assign the same  
5 value to water under all of the applications. Cyprus Bagdad will  
6 urge that each of the applications be evaluated independently in  
7 light of the evidence presented.

8 DATED this 10th day of December, 1997.

9 FENNEMORE CRAIG, P.C.

10  
11 By   
12 Lauren J. Caster  
13 Attorneys for Appellant Cyprus  
14 Bagdad Copper Corporation  
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18 Copies of the foregoing mailed  
19 this 10th day of December, 1997,  
20 to:

21 J. Dennis Wells  
22 State Land Commissioner  
23 1616 West Adams Street  
24 Phoenix, Arizona 85007

25 Terri M. Skladany  
26 Assistant Attorney General  
Solicitor General & Opinion Section  
Office of the Attorney General  
1275 West Washington Street  
Phoenix, Arizona 85007-2926  
Attorney for the Board

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4 State of Arizona  
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Phyllis J. Warren